

EXHIBIT N

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NEWELL RUBBERMAID, INC.,

Plaintiff/Counter-Defendant,

v.

SCOTT T. BOSGRAAF, et al.,

Defendants/Counter-Plaintiffs.

Case No. 1:15-cv-00597-RJJ

Judge Robert J. Jonker

KIRSCH LOFTS' SUPPLEMENTAL RULE 26(A)(1) INITIAL DISCLOSURES

Rule 26(a)(1)(A)(iii) Disclosures:

Kirsch Lofts believes all documents on which its claim for compensation are based have already been provided to Newell voluntarily as agreed to in the Joint Status Report or in response to Newell's discovery requests. If additional documents are discovered, Kirsch Lofts will disclose them in a timely manner. Kirsch Lofts' calculation of potential losses resulting from Newell's ongoing need to access the Property is as follows:

Loss of Tax Credits/Incentives

Brownfield Redevelopment MBT Credit	-\$1,690,000.00
New Markets Tax Credit Allocations (39% of total allocation)	-\$4,212,000.00
Brownfield TIF Reimbursement (6 years off the end of payment period)	-\$1,011,901.00

Loss of Profits/Carrying Costs

Return on investment for 6 year delay	-\$1,070,487.23
Carrying costs for 6 years (snow, lawn, taxes, security, etc...)	-\$150,000.00
Depreciation on buildout for 6 years (roof, media blasting, etc...)	-\$240,000.00

These numbers are preliminary numbers prepared without the assistance or input of an expert. Kirsch Lofts reserves the right to amend and/or supplement these numbers without prejudice in conjunction with the disclosure of expert reports as provided for in the Court's scheduling order.

Respectfully Submitted by:

BILA & ASSOCIATES, PLLC

December 7, 2015

/s/ Dennis W. Bila II
Dennis W. Bila II (P39975)
4270 Cottontail Lane
Harbor Springs, MI 49740
231.838.5678
bila@bilalaw.com